## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

UNITED STATES OF AMERICA,	)	
	)	
vs.	)	
	)	
	)	Case No.: 6:19-cr-00829-TMC
KATRINA ALIFF	)	
	)	
	)	

## **THIRD MOTION FOR CONTINUANCE**

COMES NOW the defendant, by and through undersigned counsel, who respectfully requests the Court continue the trial of this case. Currently this case is scheduled for the Court's September term. Assistant United States Attorney Carrie Sherard has been consulted and she consents to the motion.

Defendant is in custody in the Anderson City Jail. Due to the coronavirus pandemic, the Anderson City Jail has been closed to visitors for the past few months. As a result, counsel has been unable to meet with defendant to engage in meaningful discussions regarding resolution of the case, to include discovery review and plea discussions. In addition, in March, counsel had scheduled a psychological evaluation of the defendant by a local psychologist. Due to the pandemic and jail policy, this evaluation was canceled.

As of the filing of this motion, the jail is now allowing limited and restricted visitation. Specifically, any attorney or doctor visit must be held where the parties are in separate rooms divided by glass. One of the rooms used would be the booking room. The booking room is accessible by the entire jail staff and has regular foot traffic. Any visit must be in the presence of one to two jail officers. It is counsel's position that these conditions are not conducive to effective

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and meaningful communication with the defendant nor are they appropriate for a psychological

evaluation.

Based upon the foregoing circumstances, counsel needs additional time to discuss the case

with the defendant, complete a psychological evaluation of defendant, and negotiate a resolution

of the case with the Assistant United States Attorney. For these reasons, defendant requests the

trial of this case be continued.

Defense counsel represents to the Court that he has discussed this continuance with the

defendant, her waiver of rights under the Speedy Trial Act, and she consents to a continuance.

She has acknowledged that she understands that the time occasioned by this delay shall be

excluded from consideration under 18 U.S.C. §3161, et seq., The Speedy Trial Act.

Respectfully submitted,

s/S. Harrison Saunders, VI\_

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